

UNITED STATES COURT FOR THE 5TH CIRCUIT IN THE SOUTHERN DISTRICT OF
MISSISSIPPI.

Zorri N. Rush

V.

Open Arms Healthcare Center

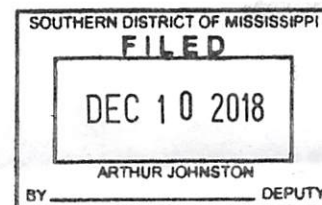
3:18cv854-HTW-LRA

CIVIL COMPLAINT

I. PARTIES TO COMPLAINT

A. PLAINTIFF- Zorri N. Rush
6912 Mount Vernon Rd
Eupora, MS 39744
6627531249
zorrirush@hotmail.com

B. DEFENDANT- Open Arms Healthcare Center
805 East River Place
Jackson, MS 39202
(601) 500-7660



II. JURISDICTION

Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Defendants in this case are charged with denying services to an individual with disabilities in violation of the Americans with Disabilities acts.. The amount in controversy exceeds \$75,000.

III. STATEMENT OF CLAIM

Defendant discharged plaintiff in this case for reasons related to mental health disabilities. The defendant did so in a medical capacity that prevented medical care and disrupted treatment plans for chronic lifelong health concerns. Defendant admit cause of action (discharge) was related to disabilities.

IV. RELIEF

A. Issue a summons directing the defendant to appear before the court.

- B. Order the defendant to submit a certified copy of the transcript and record, including evidence upon which the findings and decision to discharge patient are based.
- C. Grant any further relief as may be just and proper under the circumstances of this case.

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11. I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: the 4th day of December 2018

Signature of Plaintiff _____

Printed Name of Plaintiff _____

Zorri N. Rush